

88-8000334
BPG Goodrich

ENTIRE DOCUMENT

The BPG Goodrich Company
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Division of Environmental Health
 Administration, Dept. 9021
 May 1980-5

8EHQ-0780-0334 Follow-up A

86-8000100

July 21, 1980

2cc/

Document Control Officer
 Chemical Information Division
 Office of Pesticides and Toxic
 Substances (WH-557)
 Environmental Protection Agency
 401 M Street, S.W.
 Washington, D.C. 20460



Dear Sir:

Re: EPA Document Control No.: 8EHQ-0780-0334
TSCA Section 3(e) Submission

On June 23, 1980 this office received by Registered Mail No. 630600 your letter dated June 18, 1980, requesting:

1. Complete copies of all test protocols and data from the studies cited in our submission;
2. A description of the actions taken by the company to warn workers and customers and to further reduce and/or eliminate exposure to the subject chemicals.

The subject chemicals referred to in the TSCA Section 3(e) submission of February 19, 1980 are:

<u>CAS No.</u>	<u>Chemical Name</u>	<u>Trade Name</u>
13752-51-7	N-oxdiethylene thiocarbonyl- N-oxdiethylene sulfenamide	Cure-rite [®] 18
102-77-2	N-oxdiethylene-2-benzothiazyl OBTB sulfenamide	

The file on the testing program is substantial as you will note. Therefore, in order to help in your review, each document will be numbered and listed below:

BPG-1	Ames Protocol No. 401 (CR18CS #5805 is a commercial grade material)
BPG-2	Final Report - Ames test on CR18CS #5805
BPG-3	Mouse Lymphoma - Protocol No. 431

Page 2

Document Control Officer - EPA - 8EHQ-0280-0334

Washington, D.C.

July 21, 1980

BFG-4	Final Report - Mouse Lymphoma - CR18CS #5805
BFG-5	Appendix Raw Data
BFG-6	Protocol No. 441 BALB/3T3 Mouse Cells
BFG-7	Final Report - No. 441 - CR18CS #5805
BFG-8	Appendix Raw Data
BFG-9	Ames Protocol No. 401 Edition 3
BFG-10	Reverse Mutation Assay - Protocol No. 402 Edition 2
BFG-11	DNA Repair test - Protocol No. 403 Edition 2
BFG-12	Final Report - Tests described in BFG 9,10,11 on Cure-rite [®] 18 (Commercial)
BFG-13	Mouse Lymphoma - Protocol No. 431 Edition 2
BFG-14	Final Report - Protocol No. 431 Ed. 2 - Cure- rite [®] 18 (commercial)
BFG-15	Raw Data for BFG-14
BFG-16	Protocol No. 441 Edition 2 - BALB/3T3 Mouse Cells
BFG-17	Final Report - BFG-16-CR18 (Comm.)
BFG-18	Raw Data for BFG-17
BFG-19	Chromosome Aberrations CHO - Protocol No. 437 Ed.3
BFG-20	Final Report - CACHO - BFG-19-CR18CS #5902 (Comm.)
BFG-21	Final Report - 3 tests - CR18 (Purified)
BFG-22	Final Report - Mouse Lymphoma - CR18 (Purified)
BFG-23	Raw Data for BFG-22
BFG-24	Final Report - Protocol 441 Ed. 2 - CR18 (Purified)
BFG-25	Final Report - Protocol No. 437 Ed.3 - CR18 (Purified)

The next series of documents contain data concerning the second of the subject chemicals, OBTS.

BFG-26	Final report - 3 tests - Protocols 401 Ed.3, 402 Ed. 2, 403 Ed.2 - OBTS
BFG-27	Final Report - Mouse Lymphoma - Protocol 421 Ed.2, OBTS
BFG-28	Raw Data - for BFG-27
BFG-29	Final Report - BALB/3T3 Cells - Protocol 441 Ed.2, OBTS
BFG-30	Final Report - CACHO - Protocol No. 437 Ed.3, OBTS

This concludes the list of technical documents.

Certain actions were taken by the company to warn production workers and customers of the toxicological findings which we had reported to USEPA.

1. Letters were sent to all customers who purchase the subject chemicals. A copy of this letter (BFG-31) is included in the data packet. The letter outlines our recommendations to minimize worker exposure to these materials.

Page 3

Document Control Officer - EPA - SEHQ-0280-0334

Washington, D.C.

July 21, 1980

2. The Substantial Risk report to USEPA was discussed with appropriate United Rubber Worker representatives and all production plant representatives who would implement proper handling procedures.
3. Employees involved in the production of the subject chemicals received written and oral communication concerning the toxicological findings. See BPG-32. (Plant locations were deleted).
4. The General Trade was notified of our action via the news media.
5. Personnel meetings were arranged for interested parties who had expressed a desire for further discussions in more depth.
6. Material Safety Data Sheet (BPG-33) incorporates additional health hazard data based on the toxicological findings.


Certain actions were taken in the company rubber processing plants to reduce and/or eliminate exposure to the subject chemicals in line with the recommendations made in the customer letters.

1. Handling of subject chemicals occurs in ventilated weighing booths or using local exhaust hoods. Where this is not possible and where exposure to the subject chemicals as dust may occur, the use of 3M Model 9900 Toxic Dust Respirator is mandatory.
2. Spills are removed by vacuum cleaning rather than dry sweeping.
3. Taping of torn or punctured bags is required.
4. Employees in jobs where potential exposure may occur are issued daily changes of work clothing; take showers at the end of the shift; and wash hands before eating drinking or smoking in approved areas.
5. Eating, drinking or smoking is forbidden in the immediate work area.

Page 4
Document Control Officer - EPA - SEHQ-0280-0334
Washington, D.C.
July 21, 1980

This concludes my response to the questions posed in your letter. Should you require further information or clarification of the material submitted herewith, we will make every effort to respond further.

Very truly yours,


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374

Encl. Data Packet

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